

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES, EX REL. DR. SUSAN NEDZA,	)	
	)	
Relator,	)	No. 15-cv-6937
	)	
v.	)	JUDGE JORGE L. ALONSO
	)	
AMERICAN IMAGING MANAGEMENT, INC., ANTHEM	)	
INC., ANTHEM HEALTH PLANS OF KENTUCKY, INC.,	)	
ANTHEM HEALTH PLANS OF NEW HAMPSHIRE, INC.,	)	
ANTHEM HEALTH PLANS, INC., ANTHEM INSURANCE	)	JURY TRIAL DEMANDED
COMPANIES, INC., BLUE CROSS OF CALIFORNIA, BLUE	)	
CROSS AND BLUE SHIELD OF GEORGIA, INC., BLUE	)	
CROSS AND BLUE SHIELD HEALTHCARE PLAN OF	)	
GEORGIA, COMMUNITY INSURANCE CO., COMPCARE	)	
HEALTH SERVICE INSURANCE CORP., EMPIRE	)	
HEALTHCHOICE HMO, INC., EMPIRE HEALTHCHOICE	)	
ASSURANCE, INC., HEALTH FIRST HEALTH PLANS,	)	
INC., HMO COLORADO, INC., HMO MISSOURI, INC.,	)	
BLUE CROSS OF IDAHO CARE PLUS, INC., BLUE CROSS	)	
BLUE SHIELD OF MICHIGAN MUTUAL INSURANCE	)	
COMPANY, BLUE CROSS AND BLUE SHIELD OF NORTH	)	
CAROLINA, MODA HEALTH PLAN, INC., PRIORITY	)	
HEALTH, PROVIDENCE HEALTH PLAN, PROVIDENCE	)	
HEALTH ASSURANCE, REGENCE BLUECROSS	)	
BLUESHIELD OF OREGON, REGENCE BLUECROSS	)	
BLUESHIELD OF UTAH, REGENCE BLUESHIELD,	)	
REGENCE BLUE SHIELD OF IDAHO, ASURIS	)	
NORTHWEST HEALTH, AND PACIFICSOURCE	)	
COMMUNITY HEALTH PLANS.	)	
	)	
	)	
Defendants.	)	

**PLAINTIFF-RELATOR SUSAN NEDZA’S UNOPPOSED MOTION**  
**TO RESET STATUS HEARING**

Plaintiff-Relator Dr. Susan Nedza (“Relator”), by and through her attorneys, ask the Court to reset this Court’s status hearing of March 7, 2018, stating in support as follows:

1. On August 7, 2015, Plaintiff-Relator Dr. Susan Nedza filed the initial complaint in this matter alleging violations of the False Claims Act by American Imaging Management, Inc. (“AIM”), its parent company Anthem, and multiple health insurance companies that hired AIM to provide pre-authorization review of medical services. (ECF No. 1).

2. Pursuant to the False Claims Act, 31 U.S.C. § 3730(b), this matter remained under seal while under review by the government. On October 6, 2017, the government filed its notice of declination. (ECF No. 14). On December 21, 2017, Relator filed the First Amended Complaint. (ECF No. 22).

3. Counsel for all twenty-eight defendants contacted counsel for Relator and requested an extension between four and eight weeks to answer or otherwise plead. (ECF Nos. 47, 71, 80, 84, 92). Relator did not object to any of Defendants’ motions for an extension of time. (ECF Nos. 24, 61, 65, 68, 76, 82, 90).

4. This matter is currently set for a status hearing on March 7, 2018, which was set to assess Relator’s progress on service of the First Amended Complaint (ECF No. 21). As of January 3, 2018, Relator effectuated service on all Defendants. (ECF Nos. 26-46, 48-49, 52-53, 56-58).

5. Pursuant to this Court’s orders granting Defendants’ motions for an extension of time, all Defendants must all answer or otherwise plead no later than March 12, 2018 and March 13, 2018, with one exception (Defendant Health First Health Plans, Inc.), which is set to respond by February 12, 2018.

6. The 48-page complaint at issue contains detailed allegations against twenty-eight Defendants in this complex case filed under the False Claims Act. 31 U.S.C. §§ 3729 et seq. In the interest of judicial economy, Relator requests that the status hearing of March 7, 2018, be

continued to on or after April 4, at which time Relator's counsel will have had the opportunity to review all Defendants' responses, and the Court can set a unified, streamlined briefing schedule for Relator to respond to any motions to dismiss.

7. Defendant Health First does not oppose this motion but requests that its deadline for filing a responsive pleading be moved from February 12, 2018 to March 12, 2018 to align with the deadline for the other Defendants, should it choose to file at a later date. (ECF Nos. 80, 84, 92).

8. Defendants do not oppose this motion.

WHEREFORE, Relator ask the Court to grant her unopposed motion and:

- a. Continue the status hearing currently set for March 9, 2018 at 9:30 a.m. to a date on or after April 4, 2018;
- b. Stay briefing on any motion to dismiss until the next status hearing so that a unified briefing schedule can be set for briefing on all motions to dismiss;
- c. Reset Defendant Health First's deadline for filing a responsive pleading until March 12, 2018; and
- d. Grant any other relief the Court deems proper.

Dated: February 12, 2018

Respectfully submitted,

/s/Juliet Berger-White  
One of the Attorneys for Relator-Plaintiff  
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